

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 14**

PINNACLE FOODS GROUP, LLC,)	
)	
Respondent,)	
)	
and,)	Case No: 14-CA-226922
)	14-CA-228742
LOCAL 881 UNITED FOOD AND)	
COMMERCIAL WORKERS)	
)	
Charging Party.)	

MOTION TO RESCHEDULE HEARING

COMES NOW Pinnacle Foods Group, LLC, (“Respondent”), by and through its undersigned counsel, and for its Motion to Reschedule Hearing, states as follows:

1. The Region issued a Notice of Hearing in this matter on November 29, 2018. The Region set this matter for hearing on March 12, 2019, at 10:00 a.m.
2. Counsel for Respondent has previously-scheduled conflicts with the date set for the hearing in this matter. Counsel for Respondent has two arbitration hearings previously set for the week of March 12, 2019. The hearings have been scheduled for over two months and may not be changed.
3. There are no allegations in the Complaint that any employee has been discharged or that termination is an issue in the hearing.
5. The conflict between the hearing date and the previously-scheduled arbitration hearings constitutes good cause for rescheduling the hearing.
6. Counsel for the Respondent has contacted counsel for the Union multiple times regarding its position with respect to Respondent’s Motion but counsel for the Union has not returned Respondent’s counsel’s messages. Counsel for Respondent is available for hearing

beginning the second week of April, 2019 through the end of May, 2019. A copy of this request has been served on the Union.

7. This Motion is not made for the purpose of delay, but simply because of scheduling conflicts, and granting the request will not hinder the timely resolution of this matter.

WHEREFORE, for the foregoing reasons, Respondent respectfully requests that the Regional Director grant its Motion to Reschedule Hearing and reset the hearing of this matter for a date beginning the second week of April, 2019 or after through the end of May, 2019.

Respectfully submitted,

MCMAHON BERGER, P.C.

/s/ James N. Foster, Jr.

James N. Foster, Jr.

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Attorney for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of December, 2018, a true and correct copy of the above document was filed via electronically on the Board's website with the following individuals:

Leonard J. Perez, Regional Director
National Labor Relations Board
Region 14
1222 Spruce Street, Room 8.302
St. Louis, MO 63103-2829

I further certify that on the 17th day of December, 2018, a true and correct copy of the above document was served via United States first class mail, postage prepaid and email, upon:

Jonathan Karmel, Attorney
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Joseph C. Torres, Esq.
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/s/ James N. Foster, Jr.